

EXHIBIT 4

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION

4 No. 5:16-cv-10444
IN RE: FLINT WATER CASES Hon. Judith E. Levy
5 Mag. Mona K. Majzoub

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9 HIGHLY CONFIDENTIAL
CONTINUED VIDEOTAPED DEPOSITION OF
ROBERT T. NICHOLAS

10
11 VOLUME II
12 Wednesday, December 11, 2019
at 9:07 a.m.

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15 Taken at: Weitz & Luxenberg PC
3011 West Grand Boulevard, Suite 2100
16 Detroit, Michigan 48202

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22 REPORTED BY: CAROL A. KIRK, RMR/CSR-9139
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1 Q. I'm just interested in what you
2 can recall.

3 A. I just recall that we probably
4 talked about Flint after the Flint event, and I
5 know when Flint came out probably about nine
6 months later, we talked about it and what the
7 report was.

8 Probably Mr. Gnagy and I and
9 Mr. Edwards and probably Paul Whitmore talked
10 about it, about what was going on in Flint and
11 what had happened after we left from that
12 standpoint. Again, I probably talked to
13 Mr. Byrnes, Mr. Jensen, and Mr. Gadis about
14 that.

15 Q. And did you come up with anything
16 that maybe you could have done differently in
17 Flint to avoid this result?

18 MR. MCELVAINE: Objection.
19 You can answer.

20 A. Probably not have gone to Flint.

21 Q. Did you come up with anything
22 other than that that you could have or should
23 have done differently to avoid this result?

24 MR. MCELVAINE: Objection.

CERTIFICATE

I, Carol A. Kirk, a Registered Merit Reporter and Notary Public in and for the State of Michigan, duly commissioned and qualified, do hereby certify that the within-named ROBERT T. NICHOLAS was by me first duly sworn to testify to the truth, the whole truth, and nothing but the truth in the cause aforesaid; that the deposition then given by him was by me reduced to stenotype in the presence of said witness; that the foregoing is a true and correct transcript of the deposition so given by him; that the deposition was taken at the time and place in the caption specified and was completed without adjournment; and that I am in no way related to or employed by any attorney or party hereto or financially interested in the action; and I am not, nor is the court reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28(D).

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office at Dexter, Michigan on this 23rd day of December 2019.



CAROL A. KIRK, RMR, CSR-9139

NOTARY PUBLIC - STATE OF MICHIGAN

My Commission Expires: August 19, 2022.

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